

Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Basic Service Tier Encryption; Compatibility Between Cable Systems and Consumer Electronics Equipment

The FCC should NOT grant any waivers to members of the NCTA to encrypt basic cable channels in any district as things stand. Such channels are generally free over the air anyway so the risk of theft of signal is already relatively low. Clear QAM channels can be tuned by most modern TV sets, and the loss of this ability for many people would be a significant one. So-called DTAs are not an adequate substitute as they require an additional box, and remote, and other costs (unresponsive to commands, slow to switch channels, etc). The NCTAs arguments that theft of service and the costs of a truck roll are not persuasive.

For years they argued against allowing self-install of Cable Cards and they continue to do as much as possible to guarantee Cable Card failures. Yet now they don't want to incur the cost of a truck roll to disconnect somebody's service? Sorry, but they can't have it both ways. If truck rolls were so bad why didn't they design Cable Cards in such a way that truck rolls weren't required for their installation?

The NCTA would argue that Cable Cards are a reasonable alternative for Boxee and other consumer equipment to implement rather than Clear QAM? This would be a more reasonable argument if they hadn't made Cable Card the dismal failure it is to date thru their design, incompetence, lack of training, and so forth. Sorry, but those of us who live with Cable Cards know exactly what they think of having to support us and how little they are doing to follow the FCC mandate on self-installs, accurate/transparent billing etc. I recently had a Cable Card install with Comcast for a new TiVo Elite and lost at LEAST two days of work to get it installed successfully—multiple attempts at self-install, hours on the phone and on chat with Comcast with many well-meaning but completely ignorant of Cable Card support personnel, two truck rolls etc just to get one Cable Card installed and working. Until they can do better than that this request should be DENIED.

If/when a viable IP-based solution is available widely that can be easily implemented by electronic equipment vendors etc then this argument can be taken up again.

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